

Robert J. Lack
Robert S. Landy (*pro hac vice*)
FRIEDMAN KAPLAN SEILER & ADELMAN LLP
One Gateway Center, 25th Floor
Newark, NJ 07102-5311
(973) 877-6400
Attorneys for Crossclaimants Interfor, Inc. and Juval Aviv

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NXIVM CORPORATION, formerly known as	:	
EXECUTIVE SUCCESS PROGRAMS, INC. and FIRST	:	
PRINCIPLES, INC.,	:	No. 2:06-cv-01051 (KSH DMC/MF)
	:	
Plaintiffs,	:	STIPULATION DISMISSING
	:	COUNTS II AND III OF
- against -	:	INTERFOR'S AND AVIV'S
	:	CROSSCLAIM AND
ESTATE OF MORRIS SUTTON, ROCHELLE SUTTON,	:	WITHDRAWING CERTAIN
THE ROSS INSTITUTE, RICK ROSS a/k/a "RICKY"	:	MOTIONS
ROSS, STEPHANIE FRANCO, PAUL MARTIN, Ph.D.,	:	
and WELLSPRING RETREAT, INC.,	:	
	:	
Defendants.	:	
-----X		
RICK ROSS,	:	
	:	
Counterclaim Plaintiff,	:	
	:	
- against -	:	
	:	
KEITH RANIERE, NANCY SALZMAN,	:	
KRISTIN KEEFFE, JANE DOE	:	
and JOHN DOES 1-10,	:	
	:	
Counterclaim Defendants.	:	
-----X		
INTERFOR, INC. and JUVAL AVIV,	:	
	:	
Crossclaimants,	:	
	:	
- against -	:	
	:	
NXIVM CORPORATION, KEITH RANIERE,	:	
NANCY SALZMAN and KRISTIN KEEFFE,	:	
	:	
Crossclaim Defendants.	:	
-----X		

IT IS HEREBY STIPULATED, by and among the undersigned counsel, pursuant to Fed. R. Civ. P. 41(a)(1), that Count II (common law indemnification) and Count III (contribution) of the crossclaim of Interfor, Inc. ("Interfor") and Juval Aviv against NXIVM Corporation ("NXIVM"), Nancy Salzman, Keith Raniere, and Kristin Keffe are dismissed with prejudice and without costs.

IT IS FURTHER STIPULATED that the motions for summary judgment and partial summary judgment brought by crossclaim defendants NXIVM, Salzman, Raniere, and Keffe against Interfor and Aviv (Docket Nos. 521, 523, and 524) are hereby withdrawn.

Dated: Newark, New Jersey
January 17, 2014

s/ Robert J. Lack
Robert J. Lack
FRIEDMAN KAPLAN SEILER &
ADELMAN LLP
One Gateway Center, 25th Floor
Newark, NJ 07102-5311
(973) 877-6400

*Attorneys for Crossclaimants Interfor, Inc.
and Juval Aviv*

William McGuire ^{RSL} *with permission*
William B. McGuire
Brian M. English
TOMPKINS MCGUIRE WACHENFELD
& BARRY LLP
4 Gateway Center
100 Mulberry Street
Newark, NJ 07102-4056

*Attorneys for Crossclaim Defendants
NXIVM Corp. and Nancy Salzman*

Robert M. Leonard
~~Robert M. Leonard~~ Matthew Feder
DRINKER BIDDLE & REATH LLP
500 Campus Drive
Florham Park, NJ 07932-1047

*Attorneys for Crossclaim Defendant Keith
Raniere*

John Falzone ^{RSL} *(with permission)*
John Falzone
PARKER IBRAHIM & BERG LLC
270 Davidson Avenue
Somerset, NJ 08873

*Attorneys for Crossclaim Defendant Kristin
Keffe*

CO ORDERED: Katharine C. Hunter